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Co-Counsel to Casco Products Corp.

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re:	Chapter 11
DELPHI CORPORATION, ET AL.,	Case No. 05-44481-RDD
Debtors.	(Jointly Administered)

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**CASCO PRODUCTS CORP.'S OBJECTION TO CURE  
AMOUNT SPECIFIED IN DEBTORS' NOTICE OF CURE  
AMOUNT WITH RESPECT TO EXECUTORY CONTRACT OR UNEXPIRED  
LEASE TO BE ASSUMED AND ASSIGNED IN CONNECTION WITH  
THE SALE OF INTERIORS AND CLOSURES BUSINESSES**

Casco Products Corp. ("Casco") is a creditor and counter-party to certain contracts with one or more of the above-captioned debtors and debtors in possession (collectively, the "Debtors"). In connection with the Notice of Cure Amount with Respect to Executory Contract or Unexpired Lease to be Assumed and Assigned in Connection with the Sale of Interiors and Closures Businesses (the "Notice of Cure"), one of those contracts was identified as a contract which was to be assumed pursuant to the Master Sale And Purchase Agreement<sup>1</sup> and the cure amount due to Casco under each such Assumed Agreement was listed in the Notice of Cure as zero.

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<sup>1</sup> As defined in the Notice of Cure.

In fact, as of the date hereof, the cure amount due to Casco totals \$13,321.

Casco, by its undersigned counsel, therefore submits this objection to the cure amount set forth by the Debtors in the Notice of Cure, and in support of its objection, respectfully alleges as follows:

1. On or about April 16, 2003, and Casco entered into a certain requirements contract (the “Requirements Contract”) with the Delphi Automotive Systems LLC, one of the Debtors.

2. As of October 8, and October 14, 2005 the Debtors filed voluntary petitions with this Bankruptcy Court for relief under Chapter 11 of Title 11 of the United States Code.

3. On July 28, 2006, Casco filed proof of claim number 11923 as an unsecured claim in the amount of \$13,321 against Delphi Automotive Systems LLC (“DAS”) for amounts due to Casco pursuant to the Requirements Contract.

4. On April 27, 2007, the Debtors filed their Thirteenth Omnibus Objection to Claims [D.E. #7825] (the “Claims Objection”), which requested that the Proof of Claim be allowed against DAS in the following amounts, \$5,760.48 as a priority claim, and \$7,560.52 as an unsecured claim.

5. On June 6, 2007, this Court entered an order approving the relief sought in the Claims Objection.

6. In the Notice of Cure, the Debtors contend that there is nothing due to Casco as a Cure Amount.<sup>2</sup>

7. Casco objects to the Cure Amount listed in the Cure Notice. According to this Court’s June 6, 2007 Order, Casco has a priority claim of \$5,760.48 and an unsecured claim of \$7,560.52 against the Debtors’ estates. The Proof of Claim that was

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<sup>2</sup> As defined in the Notice.

allowed pursuant to the Court's June 6, 2007 Order, is for amounts due to Casco under to the Requirements Contract, which the Debtors wish to assume and assign.

8. Casco asserts that the \$13,321 asserted in the Proof of Claim and allowed in the Court's June 6, 2007 Order will need to be cured before the Requirements Contract can be assumed and assigned.

WHEREFORE, Casco respectfully requests the Court to determine the appropriate cure amount due to Casco under the Requirements Contract to be \$13,321, and, to provide for such other and further relief as the Court deems just and proper.

Dated: New York, New York  
December 7, 2007

**HALPERIN BATTAGLIA RAICHT, LLP**  
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